

EXHIBIT B

From: Elizabeth Marzotto Taylor <emt@deborahgordonlaw.com>
Sent: Tuesday, July 25, 2023 3:17 PM
To: Adrienne Dresevic; Deborah Gordon
Cc: Sarah Gordon Thomas; Molly Savage; Clinton Mikel; Jonathan Messina
Subject: RE: Pensler et al /Request for extension
Attachments: 11 - First Amended Complaint and Jury Demand 7-19-23.pdf

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Adrienne,
Plaintiff's Amended Complaint is attached. We will agree to a one-week extension of Defendants' time to respond.

Regards,



Elizabeth Marzotto Taylor | Attorney & Counselor |

D E B O R A H G O R D O N L A W

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From: Adrienne Dresevic <ADresevic@thehelp.com>
Sent: Tuesday, July 25, 2023 3:02 PM
To: Deborah Gordon <dgordon@deborahgordonlaw.com>
Cc: Elizabeth Marzotto Taylor <emt@deborahgordonlaw.com>; Sarah Gordon Thomas <sthomas@deborahgordonlaw.com>; Molly Savage <msavage@deborahgordonlaw.com>; Adrienne Dresevic <ADresevic@thehelp.com>; Clinton Mikel <CMikel@thehelp.com>; Jonathan Messina <jmessina@thehelp.com>
Subject: Pensler et al /Request for extension

Deborah,

Good afternoon. We have been retained by Elizabeth A. Pensler, D.O., PLLC (d/b/a "Pensler Vein and Vascular", "Pensler Vein and Vascular Surgical Institute", and "Elizabeth Face + Body Med Spa"), Elizabeth Pensler, D.O., Elizabeth Med a, PLLC, Derek Hill, D.O. and Derek L. Hill, D.O., PLLC (d/b/a "Hill Orthopedics") in connection with the recent civil complaint filed by Julia Zimmerman in the District Court for the Eastern District of Michigan under Case No. 2:23-cv-11634-NGE-APP. According to the Docket, a response is due for certain Defendants on August 7, 2023, and others on August 8, 2023.

We are assessing the Complaint and our options. We respectfully request a 45-day extension of time for all defendants to respond to the Complaint. As such, our adjourned response would be due on September 22, 2023 (i.e., 45 days). We would of course grant the same courtesy by providing a reasonable amount of time to respond.

Please consider this email as our good faith effort to meet-and-confer on the requested extension pursuant to Local Rule 7.1(a) to determine if the extension will be opposed.